

Docket-222

7330-7/1700A3

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

This is in reply to your letter of April 1, 1993, in which you inquired on behalf of your constituent, the English Volunteer Fire Department, regarding

Congressional

DUE 4-15-93

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS,
AND REPLY FOR DOCKET FILE, ROOM 222.

CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM

Congress of the United States

House of Representatives

Washington, D. C.

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ENGLISH VOLUNTEER FIRE DEPARTMENT

D O B 427

● PURPOSE

On June 13, 1991, the Federal Communications Commission (FCC) initiated a Notice of Inquiry to "explore options for promoting more effective and efficient use of the bands below 470 MHz." This action has become known as "refarming."

Five months later, the FCC held an all-day conference on refarming where technical and public policy questions were addressed. The FCC declared the refarming issue "the most significant issue taken up in the past 30 years."

Proposed rules for the refarming were issued on October 8, 1992 (PR Docket 92-235). However, the 432-page document covers more than just refarming. Part 90 of the FCC's rules would be completely rewritten and designated Part 88.

The FCC's objective in this effort is to increase, eventually by several times, the number of usable frequencies in the upper VHF (150-174 MHz) and lower HF (450-512 MHz) in the Land Mobile Radio services primarily through channel splitting, a very noble goal that has broad support.

Intentions are admirable; their execution, approved, devastating . . .

● DETAILS

The FCC plans to split the land mobile radio channels from 15 kHz - and in many cases from 30 kHz - eventually down to 5 kHz in the VHF band, and from 25 kHz down to 6.25 kHz in the UHF band. Initially, existing users would be required to reduce the width of their assigned frequencies by half by January 1, 1996. The reduction of channel width in existing radios, the FCC was advised by its staff, is a simple screwdriver adjustment of the transmitter deviation.

Unfortunately, true channel splitting is not so simple. Reducing the deviation of the transmitter will also substantially reduce the performance and reliability of the system. In a system like ours here in Harrison County, this adjustment would effectively reduce our repeater coverage by at least 50%.

More significantly, the assignment and use of the newly created adjacent channels would result in widespread interference to existing systems, because you will continue to receive signals over the entire 15 kHz channel. Receiver narrowbanding requires much more than a screwdriver adjustment. It requires, if even possible, a major and costly overhaul . . .

● BAD NEWS

Totally unrelated to channel splitting is the FCC's proposal to *limit drastically* the power output of stations located on high ground. Our repeater currently operates with an output power of 90 watts, the maximum allowed under our FCC license. Under the proposed Part 88, our repeater system will be limited to a maximum output power of 10 watts! Radio repeaters and base stations at even higher elevations will be limited to only one watt!

Mobile radios, operating on our repeater system, will be limited to a power output of 25 watts under the new rules. This means that most of your mobile radios will be required to have their output power reduced by 50-75%.

What's the FCC's reasoning behind all of this? According to them, the proposals were designed to "reduce congestion, meet future communications capacity needs, and permit, facilitate, and encourage licensees to be spectrum efficient."

What will the FCC do with all of the newly created channels? They plan to take 258 pairs of these channels and auction them off to private industry! In the very near future, our only option will be to lease air-time from an SMR.



BOTTOM LINE

I apologize for the technical detail in parts of this brochure, but I do want to emphasize the *significance* of these proposed rule changes.

What Can Be Done?

The FCC's public comment period for the Notice of Proposed Rule Making (NPRM) ends on May 28, 1992. Our continued silence could

Proposed
FCC

